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- KEVIN LUCAS -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X  
ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: October 27, 2020

TIME: 11:35 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF KEVIN LUCAS, held via Zoom, pursuant to Notice,  
before Hope Menaker, a Shorthand Reporter and  
Notary Public of the State of New York.

<p style="text-align: right;">Page 106</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 108</p> <p>1                               - KEVIN LUCAS -</p> <p>2       coding the products that -- or writing the code</p> <p>3       that builds our products and services. So</p> <p>4       literally writing in computer language to build</p> <p>5       things.</p> <p>6                               Whereas the TSC directors in OCTO do</p> <p>7       not check in code to Google Free, which is -- is</p> <p>8       our platform by which we launch our -- our</p> <p>9       products. So, in fact, I don't think they</p> <p>10      have -- I don't think TSCs in OCTO have access to</p> <p>11      write code in Google Free.</p> <p>12               Q.     Are directors writing code or are</p> <p>13      they supervising people who are writing code?</p> <p>14               A.     There's a component of -- of writing</p> <p>15      a code and -- and approving a code before it's</p> <p>16      pushed into production of -- of directors, yes.</p> <p>17               Q.     Do you know what technical</p> <p>18      requirements a technical solutions consultant is</p> <p>19      required to have?</p> <p>20                      MR. GAGE: Objection. I'm sorry, I</p> <p>21      didn't hear the question. You broke up.</p> <p>22               Q.     Do you know what technical</p> <p>23      requirements a technical solutions consultant is</p> <p>24      required to have? What are their technical</p> <p>25      qualifications --</p>
<p style="text-align: right;">Page 107</p> <p>1                               - KEVIN LUCAS -</p> <p>2       motion for us than -- than anything.</p> <p>3               Q.     And is it your testimony that they</p> <p>4       also don't work with engineering at all?</p> <p>5                      MR. GAGE: Objection.</p> <p>6               A.     It is -- how do I -- yes, basically</p> <p>7       they might interact occasionally with engineering</p> <p>8       or product management, but they by -- by saying</p> <p>9       "work with," I wouldn't characterize it as that</p> <p>10      because I interpret that as almost like close</p> <p>11      partnership and collaboration on something and</p> <p>12      that's -- that's not so much the role.</p> <p>13               Q.     What -- again, focusing on technical</p> <p>14      solution consultants, the director level in</p> <p>15      Cloud -- I mean in OCTO, I'm sorry --</p> <p>16               A.     In OCTO.</p> <p>17               Q.     -- what's the difference between the</p> <p>18      responsibilities of that role and the</p> <p>19      responsibilities of a director in software</p> <p>20      engineering?</p> <p>21               A.     It's -- it's a similar response to PM</p> <p>22      in that they're -- they're more dissimilar than</p> <p>23      they are alike.</p> <p>24                      Software engineering leaders, a</p> <p>25      portion of their role is actually building. So</p>	<p style="text-align: right;">Page 109</p> <p>1                               - KEVIN LUCAS -</p> <p>2                      MR. GAGE: Objection.</p> <p>3               Q.     -- again, focusing on directors in</p> <p>4       OCTO?</p> <p>5               A.     I would probably characterize it as</p> <p>6       the ability to understand concepts versus actually</p> <p>7       write code. So technical solutions, the -- the</p> <p>8       job family technical solutions consultant, is kind</p> <p>9       of more generally focused on understanding</p> <p>10      technical concepts and how that applies to</p> <p>11      implementation on the customer's side of the</p> <p>12      house.</p> <p>13                      Whereas the software engineering is</p> <p>14      kind of understanding the guts and everything</p> <p>15      under the hood and actually being able to build</p> <p>16      all of it from scratch.</p> <p>17                      MS. GREENE: So --</p> <p>18                      MR. GAGE: Cara, yeah, can we pause</p> <p>19      for a second. I -- I had a screen -- Kevin's</p> <p>20      screen froze and I couldn't hear him.</p> <p>21                      So, Hope, can you just tell us what's</p> <p>22      the last thing you heard and maybe just go to</p> <p>23      the question and the answer so that we all</p> <p>24      know the context of where we are on the</p> <p>25      record at least.</p>

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track, though not necessarily the individual contributors. There is a manager track.

So, broadly speaking, day-to-day responsibilities can be everything from probably the bulk of -- a reasonable amount of their time being spent on coding and/or approving codes that's have been pushed into production that ultimately make their products and services available.

I would say there's a bulk of it that -- or maybe a smaller portion that's around leading the team if you're on the people manager track. There's a reasonable part of it that is around contributing to what we call PRD, Product Requirement Documents, that these are essentially documents that define how -- like what we're trying to build and how we're actually gonna kind of build it; and there's probably a -- a small percent of time that they are kind of doing like typical business stuff, just like end meetings and corroborating and things like that.

Those are probably the broad buckets.

Q. And in what ways does the day-to-day responsibilities of Level 9 software engineers

<p style="text-align: right;">Page 174</p> <p>1                   - KEVIN LUCAS -</p> <p>2    look different?</p> <p>3           A.     Day-to-day responsibilities for</p> <p>4    software engineering don't change a whole lot from</p> <p>5    Level 8s to 9. It is similar to our conversation</p> <p>6    we previously had, whereby either the scope and</p> <p>7    visibility and impact of their role shifts in some</p> <p>8    ways.</p> <p>9           So they are probably more aligned to</p> <p>10   a higher priority product, perhaps a more kind of</p> <p>11   innovative product if you will. They may start</p> <p>12   leading a larger organization whereby more,</p> <p>13   quote/unquote, products roll up to them.</p> <p>14           So it's more about kind of scope and</p> <p>15   product prior -- priority than shifting day-to-day</p> <p>16   responsibilities from an L 8 to L 9 software</p> <p>17   engineer.</p> <p>18          Q.     What are the skills necessary for an</p> <p>19   L 8 software engineer?</p> <p>20          A.     Coding ability is probably the -- the</p> <p>21   fore -- the forerunner there for which they still</p> <p>22   have to go through coding interviews when code is</p> <p>23   submitted in their interview packets, et cetera,</p> <p>24   so that is probably the largest one.</p> <p>25           There's going to be elements,</p>	<p style="text-align: right;">Page 176</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 175</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 177</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

<p style="text-align: right;">Page 178</p> <p>1                   - KEVIN LUCAS -</p> <p>2       software engineering, but product management is</p> <p>3       still a technical role because it sits within the</p> <p>4       broader umbrella of Eng PM. So the primary</p> <p>5       partner to the PMs, to product managers, are the</p> <p>6       SWEs, are software engineers.</p> <p>7           Q.       And what are the skills that are</p> <p>8       necessary for the product management Level 8 role?</p> <p>9           A.       Yeah. For Level 8 PM directors,</p> <p>10       you're probably looking at someone who has</p> <p>11       built and/or scaled products to reasonable size</p> <p>12       and/or significant size. So kind of your product</p> <p>13       management pedigree is -- is kind of your whole</p> <p>14       profile.</p> <p>15                 I would say the -- the strategic</p> <p>16       thinking aspect of it is -- is critically</p> <p>17       important for product managers, because their</p> <p>18       having to look into the future and predict and/or</p> <p>19       anticipate what customers or users are going to</p> <p>20       want or need.</p> <p>21                 There is a monetization element of</p> <p>22       it, at least for -- for our business, whereby</p> <p>23       you're thinking from a commercial acumen</p> <p>24       perspective how do you actually drive revenue</p> <p>25       through these products and how you think about</p>	<p style="text-align: right;">Page 180</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 179</p> <p>1                   - KEVIN LUCAS -</p> <p>2       monetizing them.</p> <p>3                 Those are probably the three broad</p> <p>4       buckets that are -- are more unique to the product</p> <p>5       manager role, in addition to the other things I</p> <p>6       mentioned before about kind of like, you know,</p> <p>7       agility and ambiguity.</p> <p>8           Q.       And what skills are less of -- what</p> <p>9       additional skills are necessary at the L 9 level?</p> <p>10          A.       I would say it's probably largely</p> <p>11       around portfolio complexity, and what I mean by</p> <p>12       that is for L 8 product managers it's not uncommon</p> <p>13       that they manage a single product and/or a small,</p> <p>14       small group of products.</p> <p>15                 But once you move them to Level 9</p> <p>16       product leaders, you're really looking more so</p> <p>17       from a portfolio perspective whereby they're</p> <p>18       probably going to have, you know, half a dozen</p> <p>19       different products that roll up to them which then</p> <p>20       means you're having to manage the competing</p> <p>21       priorities and complexities across your portfolio</p> <p>22       a little bit more.</p> <p>23                 So there is a -- a systems akin</p> <p>24       aspect of it that is probably a step change from</p> <p>25       L 8 to 9.</p>	<p style="text-align: right;">Page 181</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>